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UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

ELAINE L. CHAO, Secretary of Labor,
 United States Department of Labor,

Plaintiff,

v.

UNITED FEDERATION OF SECURITY
 OFFICERS,

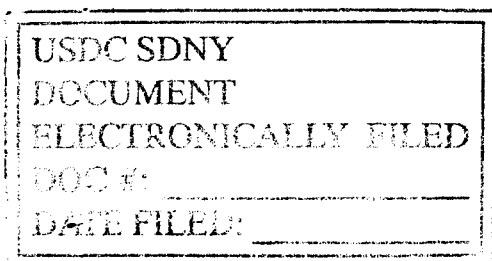
Defendant.

STIPULATION AND ORDER
OF SETTLEMENT

04 Civ. 6724 (SCR)

WHEREAS plaintiff Elaine L. Chao, Secretary, United States Department of Labor (the "Secretary"), brought this action under section 402(b) of the Labor-Management Disclosure Act of 1959, 29 U.S.C. § 482(b) (the "LMRDA"), requesting a judgment directing defendant United Federation of Security Officers ("UFSO") to conduct new nominations and a new election for the offices of President, Vice-President, and six Board of Directors, under the Secretary's supervision; and

WHEREAS the parties hereby agree to settle and compromise this action on the terms indicated below;



IT IS HEREBY STIPULATED AND AGREED, by and between the parties, as follows:

1. Within 90 days from the date of the entry of this Stipulation and Order, the UFSO will use its best efforts, as determined by the Secretary, to provide the Secretary with a list of the names and the last known home addresses for all current members of the UFSO, which lists and which addresses shall be retained exclusively by the UFSO after the Secretary certifies to the Court the names of the persons elected to the offices of UFSO President, UFSO Vice President, and the UFSO Board of Directors (6 members elected), under the Secretary's supervision.

2. The parties will enter into a protective order to protect the privacy of the names and last known home addresses of all current members during the pendency of this action.

3. The UFSO shall accept new nominations and conduct a new election for the offices of President, Vice President, and the six members of the Board of Directors under the Secretary's supervision. This election shall be completed within 150 days from the date of the entry of this Stipulation and Order. All aspects of the nominations and the election shall be held pursuant to this Stipulation and Order and shall be conducted in accordance with Title IV of the LMRDA and, so far as lawful and practicable, in conformity with the Constitution and Bylaws of the UFSO.

4. The persons elected during the supervised election shall be installed as soon as practicable, after the Secretary certifies to the Court the names of these elected persons, and such persons shall serve a term in office not to exceed three years.

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P. 4

5. All decisions as to the interpretation or application of this Stipulation and Order, and of Title IV of the LMRDA, that relate to the supervised election are to be determined by the Secretary or her representative, and shall be in conformity with the provisions of the Constitution and Bylaws of the UFSO so far as lawful and practicable.

6. The Court shall retain jurisdiction over this action. After completion of the supervised election, the Secretary shall certify to the Court the names of the persons so elected, that such election was conducted in accordance with Title IV of the LMRDA and, so far as lawful and practicable, that the election was conducted in conformity with the provisions of the Constitution and Bylaws of the UFSO. Upon approval of such certification, the Court shall enter a judgment declaring that such persons have been elected as shown by such certification.

7. This Stipulation and Order may be signed in counterparts.

8. The parties understand and agree that this stipulation and order contains the entire agreement between them, and that no statements, representations, promises, agreements, or negotiations, oral or otherwise, between the parties or their counsel that are not included herein shall be of any force or effect.

Dated: New York, New York
December __, 2004

THE LAW OFFICES OF THOMAS HALLEY

By: 

Thomas Halley, Esq.
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Dated: New York, New York
December 27, 2004

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SO ORDERED:


UNITED STATES DISTRICT JUDGE

1-6-05